

EXHIBIT B

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

NSC WHOLESALE HOLDINGS LLC., *et al.*,Debtors.¹

Chapter 11

Case No. 18-12394 (CSS)

(Jointly Administered)

NSC LIQUIDATING TRUST,

Plaintiff,

Adv. Proc. No. 20-50899 (CSS)

V.

HADDAD INTERNATIONAL LLC,

Defendant.

**AFFIDAVIT OF COUNSEL IN SUPPORT OF
PLAINTIFF NSC LIQUIDATING TRUST'S REQUEST FOR DEFAULT**

STATE OF DELAWARE

) SS:

COUNTY OF NEW CASTLE

Howard A. Cohen, Esq., being duly sworn, deposes and says:

1. I am an attorney admitted to practice in the State of Delaware and before this Court and am a Director of the firm of Gibbons, P.C., counsel for the NSC Liquidating Trust (the “Trust” or the “Plaintiff”). I have personal knowledge of the facts set forth in the affidavit.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: NSC Wholesale Holdings LLC (6210); National Wholesale Liquidators of Lodi, Inc. (4301); NSC Realty Holdings LLC (4779); NSC of West Hempstead, LLC (5582); Top Key LLC (7503); BP Liquor LLC (2059); and Teara LLC (8660).

2. I submit this affidavit in support of Plaintiff's Request for Entry of Default and Plaintiff's Request for Entry of Default Judgment against defendant Haddad International LLC (the "Defendant") pursuant to Fed. R. Civ. P. 55(b)(1), made applicable by Fed. R. Bankr. P. 7055.

3. On October 14, 2020, the Plaintiff commenced an adversary proceeding against Defendant seeking to recover preferential payments in the total amount of \$26,946.27 under §§ 547 and 550 of the Bankruptcy Code (the "Complaint").

4. A Summons and Notice of Pretrial Conference (the "Summons") was issued on December 7, 2020, and together with the Complaint, was served by the Plaintiff on the Defendant on December 8, 2020, in accordance with Fed. R. Bankr. P. 7004(a),(b)(3), and Fed. R. Civ. P. 4(c), addressed as follows:

Haddad International LLC
330 Hurst Street
Linden, NJ 07036
Attn: Alan Haddad and Officer, Managing or General Agent

5. An answer to the Complaint was due thirty (30) days after issuance of the Summons.

6. The Defendant failed to answer or otherwise defend within the time required by the Summons and Fed. R. Civ. P. 12, made applicable by Fed. R. Bankr. P. 7012 and the Defendant has not sought additional time within which to respond.

7. Pursuant to Del. Bankr. L.R. 7055-1, copies of Plaintiff's Request for Entry of Default and Request for Entry of Default Judgment are being served upon the Defendant simultaneously with their filing with the Court.

8. I am not a party to, or interested in, the outcome of the lawsuit.

9. The Defendant is not an infant, incompetent or in the military.

Dated: March 10, 2021
Wilmington, Delaware

GIBBONS P.C.

By: Howard A. Cohen
Howard A. Cohen (DE 4082)
Natasha M. Songonuga (DE 5391)
300 Delaware Avenue, Suite 1015
Wilmington, DE 19801-1671

Sworn to and subscribed before
me this 10th day of March, 2021.

By: Donna J. Seward
Notary Public

